

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA

22-cr-14034-Cannon/Maynard

CASE NO. _____
18 U.S.C. § 2320(a)(1)
18 U.S.C. § 2323

UNITED STATES OF AMERICA

v.

JOSHUA YOUNG,
Defendant.

_____ /

FILED BY SP D.C.

Jun 9, 2022

ANGELA E. NOBLE
CLERK U.S. DIST. CT.
S. D. OF FLA. - West Palm Beach

INDICTMENT

The Grand Jury charges that:

COUNT ONE

Trafficking in Counterfeit Goods
(18 U.S.C. § 2320(a)(1))

On or about May 25, 2021, in Saint Lucie County, in the Southern District of Florida, and elsewhere, the defendant,

JOSHUA YOUNG,

did intentionally traffic and attempt to traffic in goods, that is, vehicle key fobs, and, on and in connection with such goods, knowingly used counterfeit Ford Motor Company marks identical to, and substantially indistinguishable from, genuine marks in use and registered for those goods on the principal register in the United States Patent and Trademark Office, and the use of such counterfeit marks was likely to cause confusion, to cause mistake, and to deceive, in violation of Title 18, United States Code, Section 2320(a)(1).

COUNT TWO
Trafficking in Counterfeit Goods
(18 U.S.C. § 2320(a)(1))

On or about May 25, 2021, in Saint Lucie County, in the Southern District of Florida, and elsewhere, the defendant,

JOSHUA YOUNG,

did intentionally traffic and attempt to traffic in goods, that is, vehicle key fobs, and, on and in connection with such goods, knowingly used counterfeit Nissan Jidosha Kabushiki Kaisha marks identical to, and substantially indistinguishable from, genuine marks in use and registered for those goods on the principal register in the United States Patent and Trademark Office, and the use of such counterfeit marks was likely to cause confusion, to cause mistake, and to deceive, in violation of Title 18, United States Code, Section 2320(a)(1).

COUNT THREE
Trafficking in Counterfeit Goods
(18 U.S.C. § 2320(a)(1))

On or about May 25, 2021, in Saint Lucie County, in the Southern District of Florida, and elsewhere, the defendant,

JOSHUA YOUNG,

did intentionally traffic and attempt to traffic in goods, that is, vehicle key fobs, and, on and in connection with such goods, knowingly used counterfeit Stellantis marks identical to, and substantially indistinguishable from, genuine marks in use and registered for those goods on the principal register in the United States Patent and Trademark Office, and the use of such counterfeit marks was likely to cause confusion, to cause mistake, and to deceive, in violation of Title 18, United States Code, Section 2320(a)(1).

COUNT FOUR
Trafficking in Counterfeit Goods
(18 U.S.C. § 2320(a)(1))

On or about May 25, 2021, in Saint Lucie County, in the Southern District of Florida, and elsewhere, the defendant,

JOSHUA YOUNG,

did intentionally traffic and attempt to traffic in goods, that is, vehicle key fobs, and, on and in connection with such goods, knowingly used counterfeit Toyota Motor Corporation marks identical to, and substantially indistinguishable from, genuine marks in use and registered for those goods on the principal register in the United States Patent and Trademark Office, and the use of such counterfeit marks was likely to cause confusion, to cause mistake, and to deceive, in violation of Title 18, United States Code, Section 2320(a)(1).

COUNT FIVE
Trafficking in Counterfeit Goods
(18 U.S.C. § 2320(a)(1))

On or about May 25, 2021, in Saint Lucie County, in the Southern District of Florida, and elsewhere, the defendant,

JOSHUA YOUNG,

did intentionally traffic and attempt to traffic in goods, that is, vehicle key fobs, and, on and in connection with such goods, knowingly used counterfeit General Motors LLC marks identical to, and substantially indistinguishable from, genuine marks in use and registered for those goods on the principal register in the United States Patent and Trademark Office, and the use of such counterfeit marks was likely to cause confusion, to cause mistake, and to deceive, in violation of Title 18, United States Code, Section 2320(a)(1).

FORFEITURE ALLEGATIONS

1. The allegations in this Information are hereby re-alleged and by this reference fully incorporated herein for the purpose of alleging criminal forfeiture to the United States of America of certain property in which the defendant, **JOSHUA YOUNG**, has an interest.

2. Upon conviction of a violation of Title 18, United States Code, Section 2320, the defendant shall forfeit to the United States of America the following:

- (i) any article, the making or trafficking of which, is prohibited under Title 18, United States Code, Section 2320;
- (ii) any property used, or intended to be used, in any manner or part to commit or facilitate the commission of such offense; and
- (iii) any property constituting or derived from any proceeds obtained directly or indirectly as a result of the commission of such offense, pursuant to Title 18, United States Code, Section 2323.

3. The property that is subject to forfeiture as a result of the alleged offenses includes, but is not limit to, the following:

- (i) 2318 key fobs bearing Ford marks;
- (ii) 3308 key fobs bearing Nissan marks;
- (iii) 4461 key fobs bearing General Motors marks;
- (iv) 1143 key fobs bearing Stellantis marks;
- (v) 539 key fobs bearing Toyota marks;
- (vi) 1 bag of emblems bearing Stellantis marks;
- (vii) 1 bag of emblems bearing Honda and Stellantis marks;
- (viii) 1 bag of emblems bearing Ford marks; and

(ix) forty-nine 49 key blades bearing General Motors marks.

All pursuant to Title 18, United States Code, Section 2323, and the procedures set forth at Title 21, United States Code, Section 853, as incorporated by Title 18, United States Code, Sections 2323(b)(2)(A).

A TRUE BILL.

FOREPERSON



JUAN ANTONIO GONZALEZ
UNITED STATES ATTORNEY



STACEY BERGSTROM
ASSISTANT UNITED STATES ATTORNEY

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA

UNITED STATES OF AMERICA

CASE NO.: 22-cr-14034-Cannon/Maynard

v.

CERTIFICATE OF TRIAL ATTORNEY*

JOSHUA YOUNG,

Superseding Case Information:

Defendant.

Court Division (select one)

☐ Miami ☐ Key West ☒ FTP
☐ FTL ☐ WPB

New Defendant(s) (Yes or No)

Number of New Defendants

Total number of New Counts

I do hereby certify that:

1. I have carefully considered the allegations of the indictment, the number of defendants, the number of probable witnesses and the legal complexities of the Indictment/Information attached hereto.
2. I am aware that the information supplied on this statement will be relied upon by the Judges of this Court in setting their calendars and scheduling criminal trials under the mandate of the Speedy Trial Act, Title 28 U.S.C. §3161.
3. Interpreter: (Yes or No) No
List language and/or dialect:
4. This case will take 4 days for the parties to try.
5. Please check appropriate category and type of offense listed below:
(Check only one) (Check only one)
I ☒ 0 to 5 days ☐ Petty
II ☐ 6 to 10 days ☐ Minor
III ☐ 11 to 20 days ☐ Misdemeanor
IV ☐ 21 to 60 days ☒ Felony
V ☐ 61 days and over
6. Has this case been previously filed in this District Court? (Yes or No) No
If yes, Judge Case No.
7. Has a complaint been filed in this matter? (Yes or No) No
If yes, Magistrate Case No.
8. Does this case relate to a previously filed matter in this District Court? (Yes or No) No
If yes, Judge Case No.
9. Defendant(s) in federal custody as of
10. Defendant(s) in state custody as of
11. Rule 20 from the District of
12. Is this a potential death penalty case? (Yes or No) No
13. Does this case originate from a matter pending in the Northern Region of the U.S. Attorney's Office prior to August 8, 2014 (Mag. Judge Shaniek Maynard? (Yes or No) No
14. Does this case originate from a matter pending in the Central Region of the U.S. Attorney's Office prior to October 3, 2019 (Mag. Judge Jared Strauss? (Yes or No) No

By: Stacey Bergstrom
Stacey Bergstrom
Assistant United States Attorney
Court ID No. A5502614

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA

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v.

JOSHUA YOUNG,

Defendant. /

CRIMINAL COVER SHEET

1. Did this matter originate from a matter pending in the Central Region of the United States Attorney's Office prior to August 8, 2014 (Mag. Judge Shaniek Maynard)? No
2. Did this matter originate from a matter pending in the Northern Region of the United States Attorney's Office prior to October 3, 2019 (Mag. Judge Jared Strauss)? No

Respectfully submitted,

JUAN ANTONIO GONZALEZ
UNITED STATES ATTORNEY

By:

Stacey Bergstrom

Stacey Bergstrom

Assistant United States Attorney

Court ID No. A5502614

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Fort Pierce, Florida 34950

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UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA

PENALTY SHEET

Defendant's Name: Joshua Young
22-cr-14034-Cannon/Maynard

Case No: _____

Count #: 1-5

Trafficking in Counterfeit Goods, 18 U.S.C. § 2320(a)(1)

*** Max. Term of Imprisonment: 10 years**

*** Mandatory Min. Term of Imprisonment (if applicable): N/A**

*** Max. Supervised Release: 3 years**

*** Max. Fine: \$2,000,000**

*** Special Assessment: \$100**

***Refers only to possible term of incarceration, supervised release and fines. It does not include restitution, special assessments, parole terms, or forfeitures that may be applicable.**

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA**

CASE NUMBER: 22-cr-14034-Cannon/Maynard

BOND RECOMMENDATION

DEFENDANT: JOSHUA YOUNG

\$100,000 Personal Surety
(Personal Surety)(Corporate Surety) (Cash) (Pre-Trial Detention)

By: 
STACEY BERGSTROM
ASSISTANT U.S. ATTORNEY

Last Known Address: _____

What Facility: _____

Agent(s): Special Agent James Macek, HSI
(ATF)(SECRET SERVICE)(DEA)(IRS) (ICE)(OTHER)